

MH:WYC
F.#2006RO1622

07 CRIM. 622

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

INESSA SHURIGINA,
OLGA MAKSIMIYK,
OKTAVIAN KUPCHANKO,
also known as "Adik" and
"Vasiliy Voronich,"
OKSANA AVRAM,
also known as "Tatiana
Hladyr," and
LEONID GALCHIK,

Cr. No. _____
(T. 8, U.S.C., §§ 1324,
1324(a)(1)(A)(v)(I),
1324(a)(1)(B)(i) and
1324(a)(2)(B)(ii); T. 18,
U.S.C., §§ 241, 892(a),
894(a)(1), 1951(a), 2 and
3551 et seq.)

Defendants.

----- X
THE GRAND JURY CHARGES:

A TRUE COPY	
ATTEST	
DATE	June 26, 2007
ROBERT C. HEINEMANN	
CLERK	
BY	Felicia Abdellah
DEPUTY CLERK	

COUNT ONE

In or about and between April 2003 and October 2006,
both dates being approximate and inclusive, within the Eastern
District of New York and elsewhere, the defendants INESSA
SHURIGINA, OLGA MAKSIMIYK, OKTAVIAN KUPCHANKO, also known as
"Adik" and "Vasiliy Voronich," OKSANA AVRAM, also known as
"Tatiana Hladyr," and LEONID GALCHIK, together with others, did
knowingly and intentionally conspire to encourage and induce
aliens to come to, enter and reside in the United States, knowing
and in reckless disregard of the fact that such coming to, entry

APPLY FILED

JUL 10 2007

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and residence was and would be in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

In or about May 2003, within the Eastern District of New York and elsewhere, the defendants INESSA SHURIGINA, OKSANA AVRAM, also known as "Tatiana Hladyr," and LEONID GALCHIK, together with others, did knowingly and intentionally bring and attempt to bring Jane Doe #1, an alien whose identity is known to the Grand Jury, to the United States for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter or reside in the United States.

(Title 8, United States Code, Section 1324(a)(2)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

In or about May 2003, within the Eastern District of New York and elsewhere, the defendant INESSA SHURIGINA knowingly

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and intentionally made an extortionate extension of credit to Jane Doe #1.

(Title 18, United States Code, Sections 892(a), 2 and 3551 et seq.)

COUNT FOUR

In or about and between May 2003 and November 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant INESSA SHURIGINA knowingly and intentionally participated in the use of extortionate means to collect and attempt to collect extensions of credit from Jane Doe #1.

(Title 18, United States Code, Sections 894(a)(1), 2 and 3551 et seq.)

COUNT FIVE

In or about and between May 2003 and November 2003, both dates being approximate and inclusive, within the Eastern District of New York, the defendant INESSA SHURIGINA did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant obtained property, to wit: sums of money, from Jane Doe #1, with the consent of Jane Doe #1,

which consent was induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT SIX

In or about February 2006, within the Eastern District of New York and elsewhere, the defendants OLGA MAKSIMIYK, OKTAVIAN KUPCHANKO, also known as "Adik" and "Vasiliy Voronich," and OKSANA AVRAM, also known as "Tatiana Hladyr," together with others, did knowingly and intentionally bring John Doe #1, an alien whose identity is known to the Grand Jury, to the United States for the purpose of commercial advantage and private financial gain, knowing and in reckless disregard of the fact that such alien had not received prior official authorization to come to, enter or reside in the United States.

(Title 8, United States Code, Section 1324(a)(2)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT SEVEN

In or about February 2006, within the Eastern District of New York and elsewhere, the defendant OKTAVIAN KUPCHANKO, also

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known as "Adik," knowingly and intentionally made an extortionate extension of credit to John Doe #1.

(Title 18, United States Code, Sections 892(a), 2 and 3551 et seq.)

COUNT EIGHT

In or about and between February 2006 and October 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants OLGA MAKSIMIYK, OKTAVIAN KUPCHANKO, also known as "Adik" and "Vasiliy Voronich," and OKSANA AVRAM, also known as "Tatiana Hladyr," knowingly and intentionally participated in the use of extortionate means to collect and attempt to collect extensions of credit from John Doe #1.

(Title 18, United States Code, Sections 894(a)(1), 2 and 3551 et seq.)

COUNT NINE

In or about and between February 2006 and October 2006, both dates being approximate and inclusive, within the Eastern District of New York, the defendants OLGA MAKSIMIYK, OKTAVIAN KUPCHANKO, also known as "Adik" and "Vasiliy Voronich," and OKSANA AVRAM, also known as "Tatiana Hladyr," did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and others obtained property, to wit: sums

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of money, from John Doe #1, with the consent of John Doe #1,
which consent was induced through wrongful use of actual and
threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a), 2 and
3551 et seq.)

A TRUE BILL



FOREPERSON

Roslyn R. Mauskopf
ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

CR No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL Division

THE UNITED STATES OF AMERICA

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INESSA SHURGINA, et. al.: /

Defendants.

INDICATIVE MODE

Cr. No. (T. 18, U.S.C., §§ 1324, 1324(a)(1)(A)(v)(I),
1324(a)(1)(B)(i) and 1324(a)(2)(B)(ii); T. 18,
U.S.C., §§ 241, 892(a), 894(a)(1), 1951(a), 2 and
3557 et seq.)

A true bill

Foreman

Filed in open court this *day*

of A.D. 19

Bai

Winston Chan, Assistant U.S. Attorney (718) 254-7577

EASTERN

DISTRICT OF

NEW YORK

UNITED STATES OF AMERICA

v.

INESSA SHURIGINA,

WARRANT FOR ARREST

CASE NUMBER:

Defendant.

TO: The United States Marshal
and any Authorized United States Officer
and/or any Federal Bureau of Investigation Officer

YOU ARE HEREBY COMMANDED to arrest

INESSA SHURIGINA,

Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him with (brief description of offense)

alien smuggling conspiracy, in violation of T. 8, U.S.C., sections 1324(a)(1)(A)(v)(I) and 1324(A)(1)(B)(i);
alien smuggling, in violation of T. 8, U.S.C., section 1324(a)(2)(B)(ii); extortionate extension of credit, in
violation of T. 18, U.S.C., section 892(a); extortionate collection of credit, in violation of T. 18, U.S.C., section
894(a)(1); and extortion, in violation of T. 18, U.S.C., section 1951(a),

in violation of Title 18 United States Code, Section(s) § 894 (a) (1) and 1951 (a)

JAMES ORENSTEIN

Name of Issuing Officer

Signature of Issuing Officer

UNITED STATES MAGISTRATE JUDGE

Title of Issuing Officer

10/15/06

Date and Location

BROOKLYN, NEW YORK

Bail fixed at \$

By UNITED STATES MAGISTRATE JUDGE

RETURN

This warrant was received and executed with the arrest of the above name defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER:	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

EASTERN

DISTRICT OF

NEW YORK

UNITED STATES OF AMERICA

v.

OLGA MAKSIMIYK,

Defendant.

WARRANT FOR ARREST

CASE NUMBER:

TO: The United States Marshal
and any Authorized United States Officer
and/or any Federal Bureau of Investigation Officer

YOU ARE HEREBY COMMANDED to arrest _____

OLGA MAKSIMIYK,

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him with (brief description of offense)

alien smuggling conspiracy, in violation of T. 8, U.S.C., sections 1324(a)(1)(A)(v)(I) and 1324(A)(1)(B)(I);
alien smuggling, in violation of T. 8, U.S.C., section 1324(a)(2)(B)(ii); extortionate extension of credit, in
violation of T. 18, U.S.C., section 892(a); extortionate collection of credit, in violation of T. 18, U.S.C., section
894(a)(1); and extortion, in violation of T. 18, U.S.C., section 1951(a),

in violation of Title 18 United States Code, Section(s) § 894 (a) (1) and 1951 (a)

JAMES ORENSTEIN

Name of Issuing Officer



Signature of Issuing Officer

UNITED STATES MAGISTRATE JUDGE

Title of Issuing Officer

10/15/06

Date and Location

BROOKLYN, NEW YORK

Bail fixed at \$ _____

By UNITED STATES MAGISTRATE JUDGE

RETURN

This warrant was received and executed with the arrest of the above name defendant at _____

DATE RECEIVED

NAME AND TITLE OF ARRESTING OFFICER:

SIGNATURE OF ARRESTING OFFICER

DATE OF ARREST

EASTERN

DISTRICT OF

NEW YORK

UNITED STATES OF AMERICA

V.

WARRANT FOR ARREST

OKTAVIAN KUPCHANKO,
a/k/a "Adik" and "Vasiliy
Voronich,"

CASE NUMBER:

TO: The United States Marshal Defendant.
and any Authorized United States Officer
and/or any Federal Bureau of Investigation Officer

YOU ARE HEREBY COMMANDED to arrest OKTAVIAN KUPCHANKO, a/k/a
"Adik" and "Vasiliy Voronich,"

Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him with (brief description of offense)

alien smuggling conspiracy, in violation of T. 8, U.S.C., sections 1324(a)(1)(A)(v)(I) and 1324(A)(1)(B)(i);
alien smuggling, in violation of T. 8, U.S.C., section 1324(a)(2)(B)(ii); extortionate extension of credit, in
violation of T. 18, U.S.C., section 892(a); extortionate collection of credit, in violation of T. 18, U.S.C., section
894(a)(1); and extortion, in violation of T. 18, U.S.C., section 1951(a),

in violation of Title 18 United States Code, Section(s) S 894(a)(1) and 1951(a)

JAMES ORENSTEIN

Name of Issuing Officer

Signature of Issuing Officer

UNITED STATES MAGISTRATE JUDGE

Title of Issuing Officer

10/25/06

BROOKLYN, NEW YORK

Date and Location

Bail fixed at \$

By UNITED STATES MAGISTRATE JUDGE

RETURN

This warrant was received and executed with the arrest of the above name defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER:	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

EASTERN

DISTRICT OF

NEW YORK

UNITED STATES OF AMERICA

v.

OKSANA AVRAM,
a/k/a "Tatiana Heladyr,"

WARRANT FOR ARREST

CASE NUMBER:

TO: The United States Marshal Defendant.
and any Authorized United States Officer
and/or any Federal Bureau of Investigation Officer

YOU ARE HEREBY COMMANDED to arrest OKSANA AVRAM, a/k/a
"Tatiana Heladyr,"

Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him with (brief description of offense)

alien smuggling conspiracy, in violation of T. 8, U.S.C., sections 1324(a)(1)(A)(v)(I) and 1324(A)(1)(B)(i);
alien smuggling, in violation of T. 8, U.S.C., section 1324(a)(2)(B)(ii); extortionate extension of credit, in
violation of T. 18, U.S.C., section 892(a); extortionate collection of credit, in violation of T. 18, U.S.C., section
894(a)(1); and extortion, in violation of T. 18, U.S.C., section 1951(a),

in violation of Title 18 United States Code, Section(s) § 894(a)(1) and 1951(a)

JAMES ORENSTEIN

Name of Issuing Officer

Signature of Issuing Officer

UNITED STATES MAGISTRATE JUDGE

Title of Issuing Officer

10/25/06

Date and Location

BROOKLYN, NEW YORK

Bail fixed at \$

By UNITED STATES MAGISTRATE JUDGE

RETURN

This warrant was received and executed with the arrest of the above name defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER:	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

EASTERN

DISTRICT OF

NEW YORK

UNITED STATES OF AMERICA

v.

LEONID GALCHIK,

WARRANT FOR ARREST

CASE NUMBER:

Defendant.

TO: The United States Marshal
and any Authorized United States Officer
and/or any Federal Bureau of Investigation Officer

YOU ARE HEREBY COMMANDED to arrest _____

LEONID GALCHIK,

Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

Indictment Information Complaint Order of Court Violation Notice Probation Violation Petition

charging him with (brief description of offense)

alien smuggling conspiracy, in violation of T. 8, U.S.C., sections 1324(a)(1)(A)(v)(I) and 1324(A)(1)(B)(i);
alien smuggling, in violation of T. 8, U.S.C., section 1324(a)(2)(B)(ii); extortionate extension of credit, in
violation of T. 18, U.S.C., section 892(a); extortionate collection of credit, in violation of T. 18, U.S.C., section
894(a)(1); and extortion, in violation of T. 18, U.S.C., section 1951(a),

in violation of Title 18 United States Code, Section(s) S 894 (a) (1) and 1951 (a)

JAMES ORENSTEIN

Name of Issuing Officer

UNITED STATES MAGISTRATE JUDGE

Title of Issuing Officer

Signature of Issuing Officer


10/25/06

BROOKLYN, NEW YORK

Date and Location

Bail fixed at \$ _____

By UNITED STATES MAGISTRATE JUDGE

RETURN

This warrant was received and executed with the arrest of the above name defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER:	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

INFORMATION SHEET

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

1. Title of Case: **United States v. Inessa Shurigina, et al.**

2. Related Magistrate Docket Number(s):

None (X)

3. Arrest Date: **Arrest warrants to be issued**

4. Nature of offense(s): Felony
 Misdemeanor

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules): _____

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()

7. County in which crime was allegedly committed: Kings
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

8. Has this indictment/information been ordered sealed? (X) Yes () No

9. Have arrest warrants been ordered? (X) Yes () No

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY

By: Winston Y. Chan
Winston Y. Chan
Assistant U.S. Attorney
718-254-7577

United States District Court

For The

Eastern District of New York
(Handwritten)

United States of America

vs.

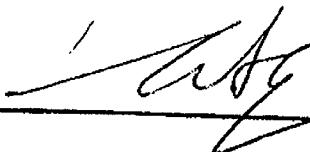
Innessa Shurigina
Olga maksimiy
Oktavian Kupchanko
OK Sana . Avram
+
Leonid Galchik

No. _____ CR

I, the undersigned foreman of the Grand Jury of this court, at the 1/24/2007
Term begun and held at Brooklyn, New York on the 25 Day of October
AD 19²⁰⁰⁶ in pursuance of Rule 6 (c) of the Federal Rules of Criminal
Procedures, and herein file with the Clerk of the Court a record of the
number of grand jurors concurring in the finding of the indictment in the
above case, this record shall not to be made public except on order of the
court, to wit:

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Grand Jurors Concurring



Foreman signature